

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**PLAINTIFF SINGULAR COMPUTING LLC'S
RESPONSE TO GOOGLE'S PROPOSED PROTECTIONS
REGARDING THE PRODUCTION OF SAMPLES**

Plaintiff, Singular Computing LLC, hereby offers the following proposed revisions to the Proposed Protections Regarding the Production of Samples submitted by Defendant, Google LLC ("Google"):

"Physical samples shall be stored in a manner that adequately addresses the security of Google's proprietary hardware. Specifically, Singular shall ~~(i)~~ store physical samples as well as related notes, photographs, videos or other documentation at Prince Lobel's office in a manner that prevents unauthorized access or inspection (e.g., in a locked room or cabinet when not in use); and ~~(ii)~~ maintain a log of any access to or inspection of the physical samples."

Dated: January 22, 2021

Respectfully submitted,

/s/ Paul J. Hayes

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ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on January 22, 2021, I served this document on defendant, Google LLC, by causing a copy to be sent via electronic mail to its counsel of record via the Court's ECF system.

/s/ Paul J. Hayes